

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DIST. OF TX.
FORT WORTH DIVISION
MAR 12 11 09 AM '04
CLERK OF COURT

RANDA HAHN

VS.

AMGEN, INC., ET AL.

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§

ACTION NO. 4:03-CV-855-Y

**PLAINTIFF'S MOTION TO EXTEND DEADLINE FOR
DESIGNATING PHYSICIANS AND MEDICAL EXPERTS**

Plaintiff moves for a 30-day extension of time to designate physicians and medical experts pursuant to the Court's December 17, 2003 Order Granting Motion to Bifurcate Discovery, Staying Non-Causation Discovery, and Setting Deadline for Summary-Judgment Motion Regarding Causation, respectfully showing the Court as follows:


Plaintiff has identified potential experts whom Plaintiff may designate pursuant to the Order. Plaintiff intends to forward the necessary documents and medical records to such potential experts for their review and consideration. Plaintiff needs additional time to forward the necessary documents and records, and the potential experts need additional time to review and consider such documents and records, before Plaintiff makes her designation pursuant to the Order.

Therefore, Plaintiff respectfully requests an additional 30 days to designate physicians and medical experts pursuant to the December 17, 2003 Order. Plaintiff does not seek this extension of time in order to delay the resolution of this case, but rather so that justice may be done.

ORIGINAL

Respectfully submitted,

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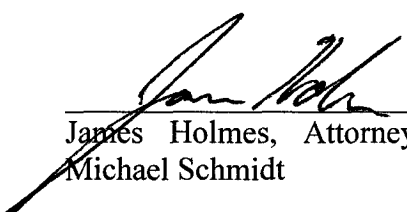
By:  *in permission by James Holmes*
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

On this 11th day of March, 2004, I conferred with opposing counsel of record for Defendant Amgen (Kathy Owen) and Defendant Wyeth (Michael Klatt) about this Motion and the relief Plaintiff seeks by it. These Defendants' counsel informed me that Defendant Amgen and Defendant Wyeth oppose this Motion and the relief sought by it.


James Holmes, Attorney acting on behalf of
Michael Schmidt

CERTIFICATE OF SERVICE

On this 11th day of March, 2004, my office served a true and correct copy of the foregoing instrument on the following counsel of record:

Via Certified Mail

Michael R. Klatt
CLARK THOMAS & WINTERS, P.C.
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Austin, Texas 78767

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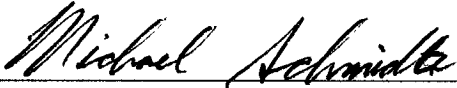
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